

UNITED STATES OF AMERICA  
DISTRICT OF MASSACHUSETTS

OMAY FORD, )  
Petitioner ) CIVIL ACTION No. 05-10431-JLT  
v. )  
UNITED STATES OF AMERICA, )  
Respondent )

**GOVERNMENT'S MOTION FOR EXTENSION OF TIME  
WITHIN WHICH TO FILE ITS RESPONSE TO  
PETITIONER'S MOTION UNDER 28 U.S.C. § 2255**


The United States of America, by Michael J. Sullivan, United States Attorney, and by Assistant U.S. Attorney Michael J. Pelgro, hereby files this motion for an extension of time within which to file its response to the petitioner's motion under 28 U.S.C. § 2255. The government seeks an extension to and including Monday, August 1, 2005.

In support of this motion, the government states that this civil case relates to a 2001 criminal case, that the prosecutor who handled the criminal case is no longer employed by the government, and that the undersigned government counsel will need to order from archives the files from the criminal case and from an earlier civil action filed by the same petitioner. In addition, government counsel is heavily involved in several investigations, trials, and appeals and thus needs additional time in order to complete an appropriate response.

Accordingly, the government respectfully requests that the Court grant it an extension of time to and including August 1, 2005.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:   
MICHAEL J. PELGRO  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Omay Ford  
Inmate # 23785-038  
FMC Devens  
P.O. Box 879  
Ayer, MA 01432

This 3rd day of June, 2005.

  
MICHAEL J. PELGRO  
ASSISTANT UNITED STATES ATTORNEY